

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Thomas Joseph Farrell, Jr.,
Debtor

SN Servicing Corporation, as Servicer
for U.S. Bank Trust National
Association, as Trustee of BKPL-EG
Basket Trust Movant

Thomas Joseph Farrell, Jr.,
Kenneth E. West, Trustee,
Respondents

Case No.: 22-12497-mdc

Chapter: 13

Judge: Magdeline D. Coleman

OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that SN Servicing Corporation, as Servicer for U.S. Bank Trust National Association, as Trustee of BKPL-EG Basket Trust (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 2218 EAST CUMBERLAND STREET PHILADELPHIA, PA 19125, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor’s plan base is insufficient to provide for the claim of Secured Creditor. The objecting creditor is due arrears of approximately \$31,381.83 to be set forth in a Proof of Claim to be filed by the Claims Deadline.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: November 23, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
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CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

I certify under penalty of perjury that I caused to be served the above captioned pleading on the parties at the addresses specified below or on the attached list on _____.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 23, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
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Service by NEF

Trustee

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Debtor's Counsel

Brad J. Sadek
Sadek and Cooper
1500 JFK Boulevard
Philadelphia, PA 19102

U.S. Trustee

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Service by First-Class Mail

Debtor

Thomas Joseph Farrell, Jr.
2218 E Cumberland Street
Philadelphia, PA 19125